

1 ROGER P. CROTEAU, ESQ.
Nevada Bar No. 4958
2 TIMOTHY E. RHODA, ESQ.
Nevada Bar No. 7878
3 ROGER P. CROTEAU & ASSOCIATES, LTD.
9120 West Post Road, Suite 100
4 Las Vegas, Nevada 89148
(702) 254-7775
5 (702) 228-7719 (facsimile)
croteaulaw@croteaulaw.com
6 *Attorney for Plaintiff*
LAS VEGAS DEVELOPMENT GROUP, LLC
7

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 ***

11 LAS VEGAS DEVELOPMENT GROUP, LLC,)
a Nevada limited liability company,)

12)
13 Plaintiff,)

14 vs.)

15 2014-1 IH BORROWER, LP, a Delaware)
limited partnership; REPUBLIC MORTGAGE,)
16 LLC, a Nevada limited liability company;)
RECONTRUST COMPANY, NA, a Texas)
17 corporation; MAGDALENA MANCHESTER,)
an individual; MAGDALENA M.)
18 MANCHESTER REVOCABLE TRUST, a)
trust; FEDERAL NATIONAL MORTGAGE)
ASSOCIATION, a federally chartered)
19 corporation; THR NEVADA II, LP, a Delaware)
limited partnership; THR PROPERTY)
20 BORROWER, LP, a Delaware limited)
partnership; THR PROPERTY GUARANTOR,)
21 LP, a Delaware limited partnership; THR)
PROPERTY HOLDCO, LP, a Delaware limited)
22 partnership; 2014-1 IH PROPERTY HOLDCO,)
LP, a Delaware limited partnership, 2014-1 IH)
23 EQUITY OWNER, LP, a Delaware limited)
partnership; CHRISTINA TRUST, a division of)
24 Wilmington Savings Fund Society, FSB, a)
federal savings bank; DOE individuals I through)
25 XX; and ROE CORPORATIONS I through)
XX,)

26)
27 Defendants.)
28

Case No. 2:15-cv-00396-RFB-GWF

STIPULATION AND ORDER TO
AMEND BRIEFING SCHEDULE
RELATED TO MOTION FOR
SUMMARY JUDGMENT [ECF #118]
(First Request)

1 and)
2 FEDERAL HOUSING FINANCE AGENCY,)
3 as Conservator of the Federal National)
Mortgage Association,)
4 Intervenor.)
5)
6 FEDERAL NATIONAL MORTGAGE)
ASSOCIATION,)
7 Counter-Plaintiff,)
8 vs.)
9 LAS VEGAS DEVELOPMENT GROUP, LLC;)
10 HIDDEN CANYON OWNERS)
ASSOCIATION,)
11 Counter-Defendants.)
12)
13 AND ALL RELATED CLAIMS)
14)

15 **STIPULATION AND ORDER TO AMEND BRIEFING SCHEDULE**
16 **RELATED TO MOTION FOR SUMMARY JUDGMENT [ECF #118]**
17 **(First Request)**

18 COMES NOW Plaintiff, LAS VEGAS DEVELOPMENT GROUP, LLC (“LVDG”), and
19 Defendants, FEDERAL NATIONAL MORTGAGE ASSOCIATION (“Fannie Mae”) and
20 FEDERAL HOUSING FINANCE AGENCY (“FHFA”), by and through their undersigned
21 counsel, and hereby stipulate and agree as follows:

- 22 1. On January 17, 2018, Fannie Mae and FHFA filed a Motion for Summary
23 Judgment herein [Doc. #118].
- 24 2. Pursuant to a Scheduling Order entered herein on January 9, 2018 [ECF #117], a
25 Response to said Motion for Summary Judgment is presently due on February 14,
26 2018, and any Reply is due on March 7, 2018.
- 27 3. LVDG’s counsel has requested an additional extension of time to prepare and file
28 a Response to the Motion for Summary Judgment due to numerous other pending
legal matters and personal obligations.

4. LVDG shall have an additional period of time until and including February 26, 2018, in which file a Response to the Motion for Summary Judgment.
5. Fannie Mae and FHFA shall have an additional period of time until and including March 21, 2018, in which to file any Replies.
6. This Stipulation is made in good faith and not for purpose of delay.

Dated this 14th day of February, 2018.

ROGER P. CROTEAU &
ASSOCIATES, LTD.

FENNEMORE CRAIG, P.C.

/s/ Timothy E. Rhoda
TIMOTHY E. RHODA, ESQ.
Nevada Bar No. 7878
9120 West Post Road, Suite 100
Las Vegas, Nevada 89148
(702) 254-7775
tim@croteaulaw.com
Attorney for Plaintiff
Las Vegas Development Group, LLC

/s/ Leslie Bryan Hart, Esq.
LESLIE BRYAN HART, ESQ.
Nevada Bar No. 4932
300 E. Second Street, Suite 1510
Reno, Nevada 89501
lhart@fclaw.com
Attorneys for Intervenor
Federal Housing Finance Agency, as
Conservator of the Federal National
Mortgage Association

AKERMAN LLP

Michael A.F. Johnson, Esq.
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Ave., NW
Washington, DC 20001-3743
202-942-5000
michael.johnson@apks.com
Attorneys for Defendant
Federal Housing Finance Agency, as
Conservator of the Federal National
Mortgage Association

/s/ Darren T. Brenner
DARREN T. BRENNER
Nevada Bar No. 8386
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134
702-634-5000
702-380-8572 (fax)
darren.brenner@akerman.com
Attorney for Defendant
Federal National Mortgage
Association, Inc.

IT IS SO ORDERED.

By: 
UNITED STATES DISTRICT JUDGE

Dated: February 15, 2018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of February, 2018, I served via the CM/ECF electronic filing system, the foregoing **STIPULATION AND ORDER TO AMEND BRIEFING SCHEDULE RELATED TO MOTION FOR SUMMARY JUDGMENT [ECF #118] (First Request)** to the following parties:

Darren T Brenner
Akerman LLP
1160 Town Center Drive, Suite 330
Las Vegas, NV 89144
702-634-5000
702-380-8572 (fax)
darren.brenner@akerman.com
Attorney for Defendant
**FEDERAL NATIONAL MORTGAGE
ASSOCIATION, INC.**

Christine M. Parvan
Akerman LLP
1160 Town Center Drive
Suite 330
Las Vegas, NV 89144
702-634-5000
702-380-8572 (fax)
christine.parvan@akerman.com
Attorney for Defendant
**FEDERAL NATIONAL MORTGAGE
ASSOCIATION, INC.**

Ariel E. Stern
Akerman LLP
1160 Town Center Drive
Suite 330
Las Vegas, NV 89144
702-634-5000
702-380-8572 (fax)
ariel.stern@akerman.com
Attorney for Defendant
**FEDERAL NATIONAL MORTGAGE
ASSOCIATION, INC.**

Fredrick J. Biedermann
Gerrard Cox & Larsen
2450 St. Rose Pkwy #200
Henderson, NV 89074
702- 796-4000
702-796-4848 (fax)

Attorney for Defendants

**2014-1 IH Property Holdco, LP; 2014-1 IH
Equity Owner, LP; 2014-IH Borrower, LP;
Christina Trust; THR Nevada II, LP; THR
Property Borrower, LP; THR Property
Guarantor, LP; THR Property Holdco, LP**

Douglas D. Gerrard
Gerrard, Cox & Larsen
2450 St. Rose Parkway
Suite 200
Henderson, NV 89074
702-796-4000
702-796-4848 (fax)

dgerrard@gerrard-cox.com

Attorney for Defendants

**2014-1 IH Property Holdco, LP; 2014-1 IH
Equity Owner, LP; 2014-IH Borrower, LP;
Christina Trust; THR Nevada II, LP; THR
Property Borrower, LP; THR Property
Guarantor, LP; THR Property Holdco, LP**

Leslie Bryan Hart
Fennemore Craig Jones Vargas
300 E. Second St.
Suite 1510
Reno, NV 89501-
775-788-2228
775-788-2229 (fax)

lhart@fclaw.com

Attorneys for Defendants

**Federal Housing Finance Agency, as
Conservator of the Federal National
Mortgage Association**

Howard Cayne
Arnold & Porter LLP
601 Massachusetts Avenue, NW
Washington, DC 20001-3743
202-942-5000

Howard.Cayne@aporter.com

Attorneys for Defendants

**Federal Housing Finance Agency, as
Conservator of the Federal National
Mortgage Association**

Michael A.F. Johnson
Arnold & Porter LLP
555 12th St NW
Washington, DC 20004
202-942-5783
michael.johnson@aporter.com
Attorneys for Defendants
**Federal Housing Finance Agency, as
Conservator of the Federal National
Mortgage Association**

Asim Varma
Arnold & Porter
555 Twelfth St, NW
Washington, DC 20004-1206
202-942-5000
[Asim Varma@aporter.com](mailto:Asim_Varma@aporter.com)
Attorneys for Defendants
**Federal Housing Finance Agency, as
Conservator of the Federal National
Mortgage Association**

Elizabeth B Lowell
Pengilly Robbins
1995 Village Center Cir., Ste. 190
Las Vegas, NV 89134-0562
702-889-6665
702-889-6664 (fax)
elowell@pengillylawfirm.com
Attorney for Defendant
Hidden Canyon Owners Association

William Shane Habdas
Akerman LLP
1160 N. Town Center Dr., Ste. 330
Las Vegas, NV 89144
702-634-5000
702-380-8572 (fax)
william.habdas@akerman.com
Attorney for Defendant
**FEDERAL NATIONAL MORTGAGE
ASSOCIATION, INC.**

/s/ Timothy E. Rhoda
An employee of ROGER P. CROTEAU &
ASSOCIATES, LTD.